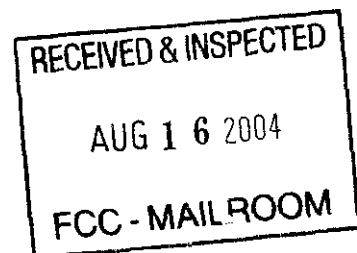




*Creative Educational
Media Corporation, Inc.*



MB Docket #04-232

July 28, 2004

Secretary's Office
Federal Communications Commission
445 12th St S.W.
Washington, DC 20554

Gentlemen:

This letter of comment is in response to the notice of proposed rulemaking which proposes to require that broadcasters make and retain recordings of their programming for a period of time, suggesting 60 or 90 days in order to increase effectiveness of the Commission's process for enforcing restrictions on obscene, indecent, and profane broadcasting programming.

First of all, I do not think that any "blanket" requirement should be imposed on all broadcasters such as daily recording numerous hours of programming and retaining them 60 or up to 90 days.

As an Educational broadcaster it would be extremely rare (if at all) that Christian talk or Christian music would contain obscene, indecent, or profane programming. If such things were said on our stations we wouldn't need help from anyone to stop it, we would deal with it immediately.

I am in agreement that the station ownership bears their share of responsibility, but I propose that the actual infractor be responsible for any obscene, indecent or profane language spoken or gestured by them.

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I don't believe we need these proposed new additions to broadcaster requirements until we aptly enforce the codes we already have.

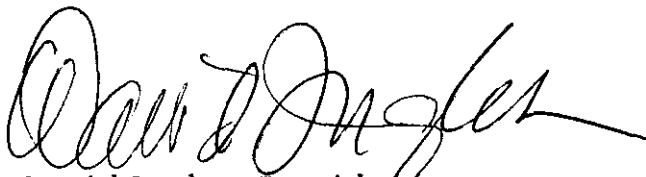
One cannot be a listener or a viewer that doesn't already witness profane infractions every broadcasting day. It seems as though some entertainers think it is "cute" to see just how far they can push the rules.

I applaud penalties or reprimands for infractions. However, the station or network has had to suffer alone while the individual infractors continue on. This is like penalizing the superintendents, principals and teachers for having a few unruly students. I'm glad you are concerned, but the imposition proposed is far too extreme to be practical for all, especially educational and Christian programming entities.

As a solution toward eradicating obscene, indecent or profane conduct over-the-air, I propose that we just enforce the rules that are now in place. Further, if a broadcast owner is found guilty of being a party to on-going airings that are obscene, indecent or profane then the Commission could require that they record and retain such recordings for a period of time in which the Commission may observe whether or not the problem has been solved.

I further propose that a complaining listener continue to be required to submit actual details of an alleged infraction so as to not encourage "easy complaining" and possibly impose "difficult work and excessive expense" to an accused (possibly innocent) broadcaster. The complainer must bear equal responsibility.

Sincerely,

A handwritten signature in black ink, appearing to read "David Ingles". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

David Ingles, President
Creative Educational Media Corp., Inc.